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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

MICHAEL FIRESTONE and LINDSAY  
BERSCHAUER, individually and as husband  
and wife; KATERINA EYRE, an individual;  
TAYLER HAYWARD, an individual; LISA  
LEDSON, an individual, THOMAS REILLY,  
an individual, and GERALD EARL  
CUMMINGS, II, an individual,

Case No: 3:24-cv-01034-SI

**DECLARATION OF LISA LEDSON**

Plaintiffs,

v.

JANET YELLEN, in her official capacity as the  
Secretary of the United States Department of the  
Treasury, UNITED STATES DEPARTMENT  
OF THE TREASURY, and ANDREA GACKI,  
in her official capacity as Acting Director of the  
Financial Crimes Enforcement Network,

Defendants.

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Declaration of Lisa Ledson

**KELL, ALTERMAN & RUNSTEIN, L.L.P.**

ATTORNEYS AT LAW

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I, Lisa Ledson, make the following declaration under penalty of perjury pursuant to the laws of the United States:

1. I am over the age of 18, am under no legal disability, and am competent to testify.

If called as a witness, I would and could testify competently to the facts set forth in this declaration based on my personal knowledge.

2. I am the organizer, registered agent and a member-manager of Nursewise Delegations, LLC. I am a beneficial owner of this entity.

3. Nursewise Delegations, LLC is an Oregon limited liability company with operations wholly in the state of Oregon.

4. Nursewise Delegations, LLC is a small business that provides nursing delegation services to patients and their care providers. Nursing delegation services I deliver include providing patient-clients and their care providers instruction and education with respect to the patient-client's medical treatment regimen as prescribed or directed by an Oregon licensed medical provider. Instructing on a medical treatment regimen can include aiding in the proper education and use of any prescribed drug or medical device. This can include, but is not limited to, proper education and use of prescribed pharmaceuticals, including the use of medical cannabis; durable medical goods; items described as drug paraphernalia under 21 U.S. Code § 863 but considered lawful under Oregon state law; and any other education and instructional aid provided to a patient as required by a licensed Oregon medical provider.

5. Nursewise Delegations, LLC conducts its nursing delegation services in the home, residential facility, or treatment facility of the patient-client.

6. As a licensed registered nurse, and in order to maintain my professional nursing license, it is my duty to comply with the laws related to the practice of nursing as set forth in state statute, state administrative rules, and by any executive branch order as determined by the Oregon Health Authority, Oregon Nursing Board or any other state agency assigned jurisdiction over the practice of nursing. Any violations of federal or state law, of any nature, can subject me

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to the loss of my professional license should those violation show up on a criminal background check report or if I fail to self-disclose those violations to the Oregon Nursing Board.

7. Nursewise Delegations, LLC is not required to disclose the identities of its beneficial owners as a condition of registering to do business in Oregon.

8. As an entity registered in 2024 with the Oregon Secretary of State, Nursewise Delegations, LLC was required to comply with the Corporate Transparency Act (“CTA”) and must have filed its beneficial ownership reports with the Financial Crimes Enforcement Network (“FinCEN”) on or before June 20, 2024.

9. Nursewise Delegations, LLC would be forced into an untenable position if required to comply with the CTA because information about the company’s beneficial owners or those with substantial control would be subject to warrantless search by federal law enforcement agencies, including federal agencies that have the power to investigate and prosecute individuals for activities and behavior that are illegal under federal law, even if those activities and behaviors do not violate state laws.

10. Nursewise Delegations, LLC would be forced to incur compliance costs should it be required to file CTA reports, including the cost of legal services related to reviewing relevant records and filings.

11. Nursewise Delegations, LLC has not filed any beneficial ownership reports with FinCEN and does not intend to disclose the identities of its beneficial owners (as defined by the CTA) absent a judicial declaration that it is required to comply with the CTA and its implementing regulations. This is because Nursewise Delegations, LLC objects to the Act’s intrusion into state sovereignty, its restriction on First Amendment rights, and its invasion of my private papers and effects that have historically been protected by the Fourth Amendment. I further object on the basis that compelled disclosure of beneficial ownership under threat of criminal penalties, particularly given Nursewise Delegations, LLC’s nexus in supporting patients with their state right to lawfully use certain drugs and paraphernalia that are as classified as

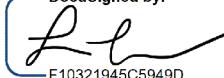
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illegal under federal law, violates my 5<sup>th</sup> Amendment right to not self-incriminate.

12. As a small business owner and nurse committed to taking care of my patient-clients, I advocate for the repeal of the CTA to protect the associational privacy interests of Nursewise Delegations, LLC's beneficial owners, and to protect individual freedoms to which I am guaranteed by the Constitution of the United States.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on 11/15/2024

DocuSigned by:  
  
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Lisa Ledson

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